

**IV. REMARKS**

Claims 1-2, 4-12, 14, 16-23 and 25-31 are pending in this application. By this Amendment, the specification and claims 1, 11, 18, and 26 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

Applicants acknowledge the Office's indication that the information disclosure statement of 9/20/2004 has not been considered. The listed Japanese publication, 10-149319, is related to information exchange, which is relevant to the examination of the current invention. Applicants submit, however, that the Japanese publication does not make the current invention unpatentable.

By this Amendment, the specification has been amended to provide additional support to the amended claims. Applicants submit that the original disclosure, especially the examples of "Chevrolet, Blazer, 1999" and "Blazer, Chevy, 99" on page 12, first paragraph, provides antecedent basis for the amendments, and no new matter has been added.

In the Office Action, claims 1-2, 4-10, 18-23 and 25-31 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Hamlin (USPN 6,310,888 B1); claims 11, 14 and 16-17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Hamlin in view of "EDI - the grand daddy of electronic commerce", BT Techhnol. J., Vol. 17, No. 3, July 1999, PP. 17-23, hereinafter "EDI". Applicants respectfully submit that the current invention is patentable for the reasons stated below.

With respect to independent claims 1, 18 and 26, Hamlin does not disclose each and every claimed feature. The current invention includes, *inter alia*, “translating data content, a data format and an application format of the transaction element[,]” as recited in claims 1, 18 and 26. A data format refers to, *inter alia*, an organization of various pieces of information of a transaction element, for example, “Chevrolet, Blazer, 1999” vs. “Blazer, Chevy, 99.” Data content refers to, *inter alia*, the substantive content of a transaction element, for example, “Chevy” vs. “Chevrolet.” As generally understood, “Chevy” or “Chevrolet” is the substantive content of data, not its format. An application format refers to, *inter alia*, a format of transaction element data under a specific software application. By sharp contrast, Hamlin does not disclose the three different types of translations of the claimed invention. Hamlin discloses a “conversion function” that “converts the data from a source (application process) format to a standard format, and then converts the data from the standard format to a destination (application process) format.” (Col. 4, lines 6-9). (Parenthetical explanations added). That is, Hamlin only discloses an application format conversion, not a data format translation, nor a data content translation.

Even if, *arguendo*, as the Office assumes without explanations, that Hamlin discloses both data format and application format conversions, Hamlin is still deficient because it does not disclose a data content translation.

In addition, Hamlin does not disclose, *inter alia*, “routing the transaction element from the first trading partner to the second trading partner in a communication protocol of the second trading partner[,]” as the current invention does. (Claims 1, 18 and 26 of the current invention). This claimed feature of the current invention solves the problem that due to the quantity of various combinations of communication protocols, adapting to or adopting every schema and

protocol is both expensive and time consuming. Hamlin discloses nothing regarding the problem of different communication protocols. Actually, by disclosing "one or more processing systems connected to a communication network" (col. 3, lines 60-61), Hamlin assumes that all the processing systems share a single communication protocol.

Moreover, Hamlin does not disclose, *inter alia*, "a second trading partner specified by the first trading partner[.]" as the current invention does. (Claims 1, 18 and 26 of the current invention). In Hamlin, "one or more destinations are identified in a database using a transaction type corresponding to the data and/or the address of the source application." (Abstract). That is, in Hamlin, the destinations (assumed to be second trading partners by the Office) are not specified by the source, but is determined by the system.

In view of the foregoing, Hamlin does not anticipate the current invention. Accordingly, Applicants respectfully request withdrawal of the rejections.

With respect to independent claim 11, Hamlin and EDI do not make the current invention obvious. Specifically, Hamlin and EDI, even in combination, do not teach or suggest each and every feature of the claimed invention. The EDI reference is provided only to overcome Hamlin's failure to disclose a method for exchanging automotive information. (See Office Action at page 5.) Even if EDI could overcome this deficiency of Hamlin, *arguendo*, it can not overcome other deficiencies of Hamlin as stated above with respect to claims 1, 18 and 26 of the current invention. Moreover, EDI does not overcome the deficiencies of Hamlin because EDI only deals with rigorously structured information, EDI defined as "exchange of structured business data between the computer systems of trading partners in an agreed standard format."

(EDI at page 17). (Emphasis added). By sharp contrast, the current invention discloses translations of different data formats, application formats and data content.

In view of the foregoing, the current invention is patentable, and Applicants respectfully requests withdrawal of the rejections

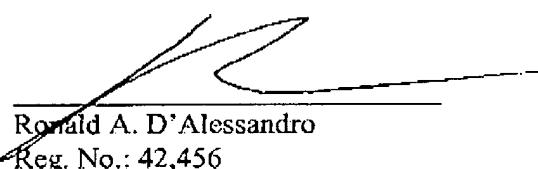
The dependent claims are believed allowable for the same reasons as stated above, as well as for their own additional features.

**V. CONCLUSION**

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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